

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION

JEAN T. THOMAS, *et al.*,

Plaintiffs,

vs.

WITTSTADT TITLE & ESCROW
COMPANY, LLC,

Defendant.

:
:
:
:
:
:
:
:
:
:
:
:

Civil No. 3:12CV450 (JRS)

JOINT MOTION TO STAY MATTER AND DISCOVERY PENDING MEDIATION

Defendant Wittstadt Title & Escrow Company, LLC (“Wittstadt”), by counsel, Carr Maloney P.C., and the Plaintiffs, Jean T. Thomas and Heath B. Thomas, on behalf of themselves and others similarly situated, respectfully jointly request that this Court enter an Order staying this matter and discovery while the parties attempt to resolve this case through mediation. In support of this Motion, the Plaintiffs refer the Court to the Memorandum of Law filed herewith.

Respectfully submitted,

WITTSTADT TITLE & ESCROW COMPANY, LLC
By Counsel

CARR MALONEY P.C.

/s/

Jan E. Simonsen, #29152
Matthew D. Berkowitz, #72728
Kristine M. Ellison, #80329
2000 L Street, NW, Suite 450
Washington, D.C. 20036
(202) 310-5500 (Telephone)
(202) 310-5555 (Facsimile)
jes@carrmaloney.com
mb@carrmaloney.com
kme@carrmaloney.com

JEAN T. THOMAS and
HEATH B. THOMAS,
*on behalf of themselves and
all others similarly situated,*

/s/

Kristi Cahoon Kelly, Esq.,
VSB #72791
SUROVELL ISAACS PETERSEN & LEVY PLC
4010 University Drive, 2nd Floor
Fairfax, VA 22030
Telephone: (703) 277-9774
Fax: (703) 591-9285
E-mail: kkelly@siplfirm.com

Susan M. Rotkis
VSB #40693
CONSUMER LITIGATION ASSOCIATES, P.C.
763 J. Clyde Morris Blvd., Suite 1-A
Newport News, VA 23601
Telephone: (757) 930-3660
Fax: (757) 930-3662
Email: srotkis@clalegal.com

Leonard A. Bennett
VSB #37523
CONSUMER LITIGATION ASSOCIATES, P.C.
763 J. Clyde Morris Blvd., Suite 1-A
Newport News, VA 23601
Telephone: (757) 930-3660
Fax: (757) 930-3662
Email: lenbennett@clalegal.com

Dale W. Pittman, VSB#15673
THE LAW OFFICE OF DALE W. PITTMAN, P.C.
112-A W. Tabb Street
Petersburg, VA 23803
Telephone: (804) 861-6000
Fax: (804) 861-3368
E-mail: dale@pittmanlawoffice.com

J. Chapman Petersen, Esq., VSB # 37225
SUROVELL ISAACS PETERSEN & LEVY PLC
4010 University Drive, 2nd Floor
Fairfax, VA 22030
Telephone: (703) 277-9774
Fax: (703) 591-9285
E-mail: jpetersen@smillaw.com

Matthew J. Erausquin, VSB #65434
CONSUMER LITIGATION ASSOCIATES, P.C.
1800 Diagonal Rd, Suite 600
Alexandria, VA 22314
Telephone: (703) 273-7770
Fax: (888) 892-3512
E-mail: matt@clalegal.com

Janelle Elene Mason
CONSUMER LITIGATION ASSOCIATES, P.C.
1800 Diagonal Rd, Suite 600
Alexandria, VA 22314
Telephone: (703) 273-7770
Fax: (888) 892-3512
E-mail: Janelle@clalegal.com

Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing was electronically served, this 5th day of March, 2013, to:

Jan E. Simonsen, #29152
Matthew D. Berkowitz, #72728
Kristine M. Ellison, #80329
2000 L Street, NW, Suite 450
Washington, D.C. 20036
(202) 310-5500 (Telephone)
(202) 310-5555 (Facsimile)
jes@carrmaloney.com
mb@carrmaloney.com
kme@carrmaloney.com

/s/

Leonard A. Bennett

VS# #37523

CONSUMER LITIGATION ASSOCIATES, P.C.

763 J. Clyde Morris Blvd., Suite 1-A

Newport News, VA 23601

Telephone: (757) 930-3660

Fax: (757) 930-3662

Email: lenbennett@clalegal.com